

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>BRIAN TAYLOR,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	<b>Civil Action 1:15-cv-1405-TSE-JFA</b>
	)	
<b>CORELOGIC SAFERENT, LLC,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S RESPONSE TO  
PLAINTIFF’S MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT**

Defendant, CoreLogic SafeRent, LLC (“SafeRent”), by counsel, states as follows for its response to Plaintiff’s Motion for Leave to File an Amended Complaint. (Dkt. No. 35).

SafeRent disagrees with Plaintiff’s characterizations of his claims and SafeRent’s alleged conduct, as set forth in the memorandum seeking leave to amend the Complaint. Those claims have been denied by SafeRent and are contested. SafeRent submits, however, that the decision of whether to permit amendment in this posture rests in the sound discretion of the Court, and SafeRent does not actively oppose Plaintiff’s motion. Thus, SafeRent requests that the Court rule on the motion without a hearing, which is currently scheduled for April 8, 2016 at 10:00 a.m.

**CORELOGIC SAFERENT, LLC**

By: /s/  
David N. Anthony  
Virginia State Bar No. 31696  
Meagan A. Mihalko  
Virginia State Bar No. 80703  
Timothy J. St. George  
Virginia State Bar No. 77349  
TROUTMAN SANDERS LLP  
1001 Haxall Point  
P.O. Box 1122  
Richmond, VA 23218  
Telephone: (804) 697-1200  
Facsimile: (804) 698-5118  
E-mail: david.anthony@troutmansanders.com  
E-mail: meagan.mihalko@troutmansanders.com  
Email: tim.stgeorge@troutmansanders.com

Ronald I. Raether, Jr. (*pro hac vice*)  
TROUTMAN SANDERS LLP  
5 Park Plaza  
Suite 1400  
Irvine, California 92614  
Telephone: (949) 622-2722  
Facsimile: (949) 622 -2739  
ronald.raether@troutmansanders.com

*Attorneys for Defendant CoreLogic SafeRent, LLC*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing pleading has been filed with the Court's Electronic Case Filing system on this 6th day of April, 2016, which will send a notice of electronic filing to the following counsel of record:

Kristi C. Kelly  
Andrew J. Guzzo  
KELLY & CRANDALL PLC  
4084 University Drive, Suite 202A  
Fairfax, VA 22030  
Telephone: 703-424-7570  
Facsimile: 703-591-0167  
Email: kkelly@kellyandcrandall.com  
Email: aguzzo@kellyandcrandall.com

*Counsel for Plaintiff*

/s/ \_\_\_\_\_  
Timothy J. St. George  
Virginia State Bar No. 77349  
*Attorneys for CoreLogic SafeRent, LLC*  
TROUTMAN SANDERS LLP  
1001 Haxall Point  
Richmond, VA 23219  
Telephone: 804-697-1254  
Facsimile: 804-697-1300  
Email: tim.stgeorge@troutmansanders.com